

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF JULIE CHEN-BURTON ON BEHALF OF THE UMPG
PLAINTIFFS IN OPPOSITION TO DEFENDANTS' SECOND MOTION TO COMPEL**

I, Julie Chen-Burton, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am currently employed as Director, Business Affairs at Universal Music Publishing Group. I have held that position or a similar position since September 2018. I have personal knowledge of the facts set forth below and/or have learned of these facts as a result of my position and responsibilities at Universal Music Publishing Group. If called upon and sworn as a witness, I could and would testify competently as to the matters set forth herein.

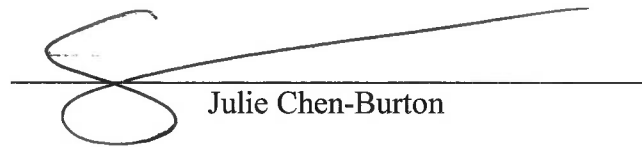
2. I submit this declaration on behalf of Plaintiffs Universal Music Corp., Universal Music – MGB NA LLC, Universal Music Publishing Inc., Universal Music Publishing AB, Universal Music Publishing Limited, Universal Music Publishing MGB Limited, Universal Music – Z Tunes LLC, Universal/Island Music Limited, Universal/MCA Music Publishing Pty. Limited, Universal – Polygram International Tunes, Inc., Universal – Songs of Polygram International, Inc., Universal Polygram International Publishing, Inc., Music Corporation of America, Inc. d/b/a Universal Music Corp., Polygram Publishing, Inc., Rondor Music International, Inc., and Songs of Universal, Inc. (hereinafter, collectively, “UMPG”).

3. I understand that this declaration is to be submitted to the Court in connection with a motion to compel filed by Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, “Defendants” or “Cox”). I also understand that Cox seeks documents and information relating to termination notices UMPG has received pursuant to Sections 203 or 304 of the Copyright Act (17 U.S.C. §§ 203, 304).

4. I understand that the claim period in this case ends on November 26, 2014 and

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Julie Chen-Burton

Executed this 8th day of July, 2019 in Santa Monica, California.